

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**INTELLECTUAL VENTURES II LLC,**

Plaintiff,

v.

**TESLA, INC.,**

Defendant.

Civil Action No. 6:24-cv-188-ADA

**JURY TRIAL DEMANDED**

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**JOINT MOTION & STIPULATION TO TRANSFER VENUE TO AUSTIN  
DIVISION**

WHEREAS, on April 12, 2024, Intellectual Ventures II LLC (“IV”) filed the above-captioned action against Defendant Tesla, Inc. (“Tesla”), in the United States District Court for the Western District of Texas, Waco Division.

WHEREAS, in the above-captioned action, IV alleges infringement of United States Patent Nos. 7,336,805; 9,706,500; 10,292,138; 10,952,153; 8,898,395; 10,136,416; 7,916,180; 9,232,158; 7,181,743; 6,894,639; 11,206,670; and 11,664,889.

WHEREAS, the above-captioned action could have been brought in the Austin Division of the Western District of Texas.

WHEREAS, the parties met and conferred and agreed to stipulate to the transfer of the case to the Western District of Texas, Austin Division from the Western District of Texas, Waco Division.

WHEREAS, the parties seek to avoid the costs associated with motion practice.

WHEREAS, IV requests that Judge Alan Albright remain as the Judge in Western District of Texas, Austin Division and Tesla does not oppose IV’s request.

NOW, THEREFORE, IV and Tesla, stipulate and jointly move this Court to enter an Order transferring the above-captioned action to the Western District of Texas, Austin Division, pursuant to 28 U.S.C. § 1404(b).

Dated: August 1, 2024

Respectfully Submitted,

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**COUNSEL FOR DEFENDANT,  
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Dated: August 1, 2024

RESPECTFULLY SUBMITTED,

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**INTELLECTUAL VENTURES II LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on August 1, 2024, and was served via CM/ECF on all counsel of record.

*/s/Matt Colvin*  
Matt Colvin